IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

COREY L. HARRIS MAR 22 A8:13 Plaintiff,)	
v. U.S. DISTRICT COURT)	C.A. No. 04-369 Erie
DOMESTIC RELATIONS SECTION et. al Defendants)	District Judge McLaughlin Magistrate Judge Baxter

ANSWERS TO COMPLAINT

And now comes Denise Nelson, defendant under the above referenced case no. 04-369, a resident of Erie County and a citizen of the United States.

Agreed, Denise Nelson was an employee of the Erie County Court of Common Pleas under the leadership of Mark Causgrove, Department Director of the Domestic Relations Section, and performed such duties as an enforcement officer from March 1, 1995 until her resignation on September 2, 2005.

Agreed, duties of an enforcement officer required the submission of such child support orders that were in contempt of court set by the Judges of the Court of Common Pleas, Family Court. The plaintiff Corey Harris was found in contempt of court on one or more occasions and arrested for same.

Allegation, Defendant Denise Nelson submitted the Plaintiff's "name on court dockets to allow a process to go forward."

Denied, Defendant Denise Nelson did not operate outside of her job responsibilities or scope of duties to submit orders of contempt against the plaintiff Corey L. Harris. Defendant further request that proof of such allegations be presented with evidence to support same.

Allegation, Defendant Denise Nelson falsified documents presented to the Erie County Court of Common Pleas in the course of her employment responsibilities.

Denied, Defendant Denise Nelson did not present any documents to the court that resulted in a false claim relative to the plaintiff's employment status. The defendant maintains that all evidence submitted was gathered by the Domestic Relations office and rightfully submitted in accordance with court procedures. Defendant further request that proof of such allegations be presented with evidence to support same.

Allegation, Defendant Denise Nelson is a "family member of Defendant, Vivian Tate of Gentlemen's Quarters Beauty Shop."

Denied, Defendant Denise Nelson is not a relative of Vivian Tate and further request that proof of such allegations be presented with evidence to support same.

Allegation, Defendant Denise Nelson "attended the business on a daily stop by to inform of such progress made by the court on the plaintiff and his open cases."

Denied, Defendant Denise Nelson did not engage in such activity and further request that proof of such allegations be presented with evidence to support same.

Allegation, Defendant Denise Nelson "used her position to benefit the baby sitting services of a long time friend, defendant Vivian Tate by giving information to the defendants."

Denied, Defendant Denise Nelson, at no time, extended information to the defendant in support of any cases issuant against the plaintiff Corey Harris. Defendant further request that proof of such allegations be presented with evidence to support same.

I, Denise Nelson hereby state that the above was prepared by me to the best of my knowledge.

March 21, 2006

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

COREY L. HARRIS)	
Plaintiff,)	
)	
v.)	C.A. No. 04-369 Erie
)	District Judge McLaughlin
DOMESTIC RELATIONS SECTION)	Magistrate Judge Baxter
et, al Defendants		

To:

Corey Harris P. O. Box 3618 Erie, Pa 16508

From:

Denise Nelson 4218 Roxanna Drive Erie, PA 16510